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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

NINA AGDAL,

Plaintiff,

v.

DILLON DANIS,

Defendant.

Case No.: 2:23-CV-16873-MCA-MAH

**PLAINTIFF'S CERTIFICATE OF SERVICE**

As required by this Court's Order dated September 7, 2023 [D.E. 7], Plaintiff Nina Agdal ("Plaintiff") files this Certificate of Service and states as follows:

1. On September 7, 2023, this Court entered an Order imposing temporary restraints upon Defendant and setting a show cause hearing for September 12, 2023, and related pre-hearing deadlines. *See* D.E. 7 (the "Show Cause Order").

2. Paragraph 5 of the Show Cause Order states: “Plaintiff shall serve Defendant a copy of this Order, Summons, Verified Complaint, supporting Declarations, and Memorandum of law immediately, via personal service, email, and mail service and shall forthwith file a certificate of service with the Court.”

**EMAIL**

3. On September 6, 2023, at approximately 3:17 p.m. EST in the afternoon, as this case was in the process of being opened, Plaintiff’s counsel emailed Defendant’s manager,<sup>1</sup> John Meehan at johnm@paradigmsports.com, attaching, among other things, the Verified Complaint, the proposed Order to Show Cause, the Memorandum of Law in Support of Motion for Temporary Restraining Order, and the supporting Declarations and exhibits, and asking that the filings be forwarded to Defendant.

4. At approximately 6:40 p.m. EST on the same day, after the case was opened, the undersigned followed up by emailing Mr. Meehan the Court-stamped versions of these filings, in addition to the Clerk-issued Summons, and requested that they be forwarded to Defendant.

5. Although Plaintiff’s counsel did not receive a response to either of these emails, at 4:00 p.m. EST on the same day—within 45 minutes of the original email to Mr. Meehan and before the case was opened—Defendant posted on X (formerly Twitter) about the lawsuit, including his knowledge that Plaintiff was seeking a temporary restraining order.

6. On September 7, 2023, at approximately 5:05 p.m. EST, upon entry of the Show Cause Order, Plaintiff’s counsel emailed the Show Cause Order to Mr. Meehan and requested that it be forwarded to Defendant. Plaintiff’s counsel did not receive a response to this email.

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<sup>1</sup> Defendant is a mixed martial artist and boxer whose professional affairs are managed by the sports management company Paradigm Sports Management, LLC.

**MAIL**

7. On September 8, 2023, Plaintiff's counsel mailed copies of the Summons, Verified Complaint, Memorandum of Law, supporting Declarations, and Show Cause Order to Defendant via Federal Express for overnight delivery at his home address (*i.e.*, the apartment where he resides).

**PERSONAL SERVICE**

8. On September 7, 2023, Plaintiff retained the investigative firm Sage Intelligence Group ("Sage") to effect personal service of the Summons, Verified Complaint, proposed Order to Show Cause, Memorandum of Law, and supporting Declarations and exhibits upon Defendant. That afternoon, Sage attempted personal service of these documents upon Defendant at his apartment and at the gym where he is known to be training regularly for an upcoming boxing match, which is part of the same building as Defendant's apartment complex.

9. Defendant purposefully evaded service. In an X post at 3:44 p.m. EST on September 7, 2023, Defendant posted a picture of Sage investigators outside his gym, which said, "*Not gonna serve me today losers,*" followed by a laughing emoji. (emphasis added)

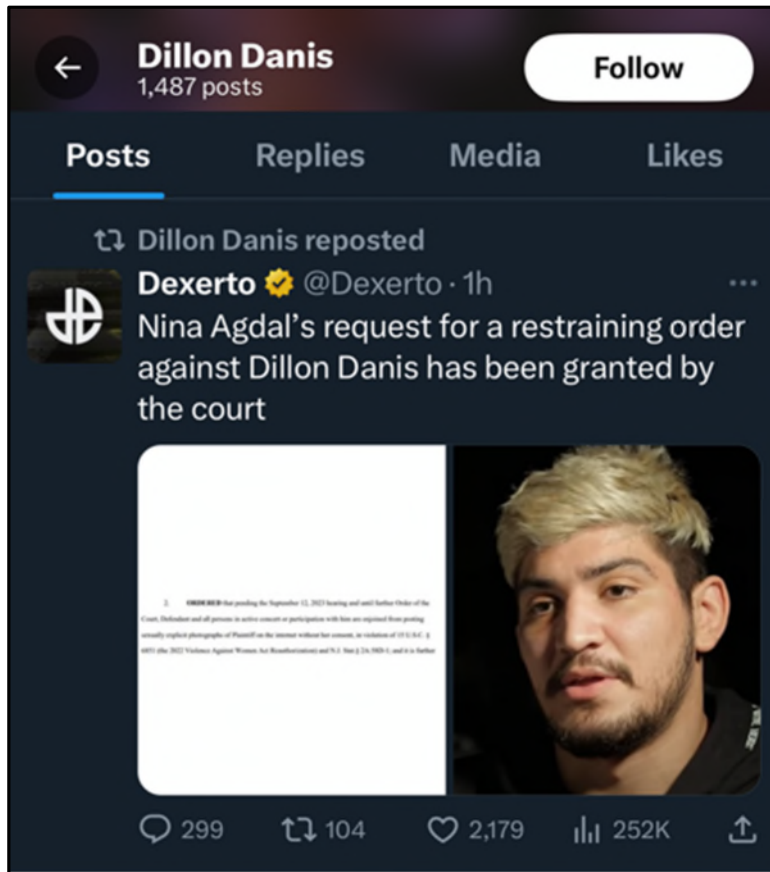
10. Later on September 7, 2023, Defendant uploaded several additional posts to his X account about his attempts to evade service. In one post at 4:37 p.m. EST, which since has been deleted, Defendant wrote: "*Being on the run sucks I just wanna go to the gas station and pick up some zyns,*" followed by a laughing emoji. (emphasis added)

11. Given Defendant's evasion of service, on September 7, 2023, Sage left copies of the Summons, Verified Complaint, unexecuted Order to Show Cause, Memorandum of Law, and supporting Declarations outside the front door of Defendant's apartment (at approximately 5:23 p.m. EST) and with the receptionist at his gym (at approximately 5:27 p.m. EST).

12. Immediately after this Court issued the Show Cause Order on September 7, 2023, Sage attempted personal service of the executed Order upon Defendant, but Defendant again evaded service. Sage therefore left a copy of the Show Cause Order outside the front door of his apartment (at approximately 6:10 p.m. EST) and with the receptionist at his gym (at approximately 6:16 p.m. EST). Notably, when the investigators returned to Defendant's apartment to attempt service of the Show Cause Order at approximately 6:10 p.m. EST, the documents they had left at 5:23 p.m. EST no longer were in his doorway.

13. In an X post on September 7, 2023, at 6:13 p.m. EST, Defendant confirmed that Sage's service attempts were made at his actual address (as opposed to an old or mistaken address) by posting a video clip of home security footage depicting a Sage investigator attempting service outside his front door. The post said: "Get the fuck away from my door taking pictures and shit I'm in North Korea [ ] come find me."

14. Shortly thereafter, at approximately 7:00 p.m. EST, Defendant confirmed his knowledge of the Show Cause Order, including the temporary restraints imposed by the Show Cause Order and the September 12, 2023 hearing, by "reposting" the following post on his X account:



2. **ORDERED** that pending the September 12, 2023 hearing and until further Order of the Court, Defendant and all persons in active concert or participation with him are enjoined from posting sexually explicit photographs of Plaintiff on the internet without her consent, in violation of 15 U.S.C. § 6851 (the 2022 Violence Against Women Act Reauthorization) and N.J. Stat. § 2A:58D-1; and it is further

15. Defendant deleted that post within an hour.

Dated: September 8, 2023

Respectfully submitted,

**SILLS CUMMINS & GROSS P.C.**

*/s/ Joseph B. Shumofsky*

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